

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

BASIC ENERGY SERVICES INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 21-90002 (DRJ)
)
) (Jointly Administered)
)

**DEBTORS' EMERGENCY MOTION TO ALTER OR AMEND THE
INSURANCE ORDER**

Emergency relief has been requested.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must file a written response prior to the below date by which relief is requested. Otherwise, the Court may treat the request as unopposed and grant the relief requested.

Relief is requested no later than November 24, 2021.

The above-captioned reorganized debtors (collectively, the "Debtors") state the following in support of this motion (this "Motion"):

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157 (b). The Reorganized Debtors confirm their consent, pursuant to Bankruptcy Rule 7008, to the entry of a final order.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Basic Energy Services, L.P. (1819); Basic Energy Services, Inc. (1194); C&J Well Services, Inc. (5684); KVS Transportation, Inc. (4882); Indigo Injection #3, LLC (7657); Basic Energy Services GP, LLC (1197); Basic Energy Services LP, LLC (1195); Taylor Industries, LLC (7037); SCH Disposal, L.L.C. (8335); Agua Libre Holdco LLC (3092); Agua Libre Asset Co LLC (1409); Agua Libre Midstream LLC (6701); and Basic ESA, Inc. (2279). The Debtors' headquarters and service address for the purposes of these chapter 11 cases is 801 Cherry Street, Suite 2100, Fort Worth, Texas 76102.

3. The bases for the relief requested herein is section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), and rule 9024 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 59(e) of the Federal Rules of Civil Procedure.

Relief Requested

4. On August 17, 2021 the Debtors filed their *Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs and Surety Bond Program and (B) Pay all Postpetition Obligations with Respect Thereto; (II) Modifying the Automatic Stay with Respect to the Workers’ Compensation Program; and Granting Related Relief* (the “Insurance Motion”) [Docket No. 10].

5. On November 13, 2021 the Court entered the *Final Order (I) Authorizing Debtors to (A) Continue Insurance Programs and Surety Bond Program and (B) Pay all Postpetition Obligations with Respect Thereto; (II) Modifying the Automatic Stay with Respect to the Workers’ Compensation Program; and Granting Related Relief* (the “Final Insurance Order”) [Docket No. 341].

6. The Debtors seek entry of an order amending or altering the portions of the Final Insurance Order. The Insurance Motion sought relief to pay certain insurance brokers including Lockton, Price Forbes, and McGriff (the “Brokers”).² The Final Insurance Order found that service was proper and the Debtors believe that service was proper at the time that the Insurance Motion was served. In the Final Insurance Order, the Debtors inadvertently omitted explicit language authorizing the payment of the Brokers. The Debtors now seek amendment of the Insurance Order to include explicit relief authorizing the Debtors to pay the Brokers as was requested in the Insurance Motion.

² As those terms are defined in the Insurance Motion.

Notice

7. This Motion will be served on (a) the Brokers (as that term is defined in this Motion); (b) the United States Trustee for the Southern District of Texas; (c) any party receiving electronic notice in these cases; and (d) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

Conclusion

8. The Debtors request that the Court grant the relief requested in this Motion and grant the Debtors such other and further relief to which they may be entitled.

Houston, TX
November 18, 2021

/s/ Veronica A. Polnick

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Certificate of Service

I certify that on November 18, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Veronica A. Polnick

Veronica A. Polnick